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June 12, 2012

**VIA ECF**

Hon. Karen M. Williams  
United States Magistrate Judge  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza  
Camden, N.J. 08101

Re: Stewart v. Beam Global Wine & Spirits, et al.  
CASE NO.: 1:11-cv-05149 (NLH) (KMW)

Dear Magistrate Judge Williams:

We represent the plaintiffs in the above-captioned action and write to request (i) a conference call with the Court and (ii) an adjournment of plaintiffs' deadline to file their class certification motion, currently set for June 15, 2012.

During our May 9, 2012 telephonic status conference, the parties agreed that Plaintiffs would file their motion for class certification by Friday, June 15, 2012. The June 15<sup>th</sup> filing deadline was premised on Defendants commencing rolling document productions by May 23<sup>rd</sup>.

Following the conference, Plaintiffs proposed a form of protective order consistent with the standard in the District of New Jersey. Defendants had extensive comments to that order. The parties have now exchanged comments on the form of protective order but have been unable to agree on a mutually-acceptable order. Because of that disagreement, Defendants withheld production of documents. Accordingly, Plaintiffs have not had the benefit of class-related discovery, including but not limited to, sales data and marketing information needed to prepare the motion for class certification.

For that reason, Plaintiffs hereby request: (1) an adjournment of the June 15, 2012 deadline for filing of Plaintiffs' motion for class certification, (2) a conference call with all counsel at the Court's convenience at which will be determined (i) a date for entry of a protective order, (ii) a date certain by which Defendants will produce class-related document discovery and (iii) a new date for filing of Plaintiffs' motion for class certification.

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As an additional housekeeping matter, we have been advised that Defendants do not object to Plaintiffs' motion for leave to file a second amended complaint which is currently returnable July 2. We have prepared and circulated a consent order addressing that issue and will file it with the Court upon receiving approval from Defendants.

Respectfully submitted,

*/s/ Evan A. Showell*  
Evan A. Showell

cc via ECF only:  
All counsel of record registered to receive ECF notification